

 ORIGINAL

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
**AMADO S. PLA, KEVIN JOSEPH, and  
YISHMAEL LEVI, Individually, and on  
Behalf Of All Other Persons Similarly Situated,**

**Plaintiffs,**

**-against-**

**RENAISSANCE EQUITY HOLDINGS, LLC,  
CLIPPER EQUITY, LLC, MY GUARD  
SECURITY CORP., DAVID BISTRICER,  
Individually, RAFAEL GARCIA, Individually,  
MARC ANTHONY GARCIA, Individually, and  
JOHN MURPHY, Individually.**

**Defendants.**

-----X

**12 Civ. 5268 (JMF)**

**OFFER OF JUDGMENT**

Defendants hereby serves, but does not file, this offer of judgment as follows:

1. Defendants offers to allow judgment to be taken against Defendant Renaissance Equity Holdings, LLC in favor of Plaintiff Amado Pla in the amount of \$3,250.00, inclusive of interest as of the date of acceptance.
2. Defendants offers to allow judgment to be taken against Defendant Renaissance Equity Holdings, LLC in favor of Plaintiff Kevin Joseph in the amount of \$ 50.00, inclusive of interest as of the date of acceptance.
3. Defendants offers to allow judgment to be taken against Defendant Renaissance Equity Holdings, LLC in favor of Plaintiff Yishmael Levi in the amount of \$ 2,500.00, inclusive of interest as of the date of acceptance.
4. Defendants offers to allow judgment to be taken against Defendant My Guard Security Corp. in favor of Plaintiff Amado Pla in the amount of \$26,000.00, inclusive of interest as of the date of acceptance.

5. Defendants offers to allow judgment to be taken against Defendant My Guard Security Corp. in favor of Plaintiff Kevin Joseph in the amount of \$ 500.00, inclusive of interest as of the date of acceptance.

6. Defendants offers to allow judgment to be taken against Defendant My Guard Security Corp. in favor of Plaintiff Yishmael Levi in the amount of \$6,000.00, inclusive of interest as of the date of acceptance.

7. This offer is exclusive of costs and reasonable attorneys' fees which shall be decided by the Court.

8. This offer will be deemed withdrawn if it is not accepted within fourteen days of receipt by Plaintiff.

Dated: Garden City, New York  
October 22, 2012

Respectfully submitted,

By:



Joshua Marcus, Esq. (JM 4250)

**FRANKLIN, GRINGER & COHEN, P.C.**

*Attorneys for Defendants*

666 Old Country Road, Suite 202

Garden City, NY 11530-2013

(516) 228-3131

TO: Walker J. Harman, Esq. (WH-8044)  
Peter J. Andrews (PA 3295)  
THE HARMAN FIRM, P.C.  
*Attorneys for Plaintiffs*  
200 West 57<sup>th</sup> Street, Suite 900  
New York, NY 10019  
(212) 425-2600

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X 12 Cv. 5268 (JMF)  
AMADO S. PLA, KEVIN JOSEPH, and YISHMAEL  
LEVI, Individually, And On Behalf Of All Other  
Persons Similarly Situated,

Plaintiffs,

-against-

**AFFIDAVIT OF SERVICE**

RENAISSANCE EQUITY HOLDINGS, LLC,  
CLIPPER EQUITY, MY GUARD SECURITY CORP.,  
DAVID BISTRICER, Individually, RAFAEL GARCIA,  
Individually, MARC ANTHONY GARCIA, Individually,  
and JOHN MURPHY, Individually,

Defendants.

-----X

STATE OF NEW YORK     )  
                                  ) ss:  
COUNTY OF NASSAU     )

JEAN FRANKLIN, being duly sworn, deposes and says: deponent is not a party to the action, is over 18 years of age, and resides at Wantagh, New York.

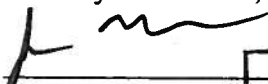
On October 22, 2012 deponent served a true copy of the annexed **OFFER OF JUDGMENT** via facsimile transmission at 11:59 a.m. and by mailing same in a sealed envelope, with postage prepaid thereon, in a post-office or official depository of the U.S. Postal Service within the State of New York, addressed to the last known address of the addressee(s) as indicated below:

Walker J. Harman, Esq.  
Peter J. Andrews  
THE HARMAN FIRM, P.C.  
200 West 57<sup>th</sup> Street, Suite 900  
New York, NY 10019

Fax No. (212) 202-3926

  
JEAN FRANKLIN

Sworn to before me this  
22<sup>nd</sup> day of October, 2012

  
NOTARY PUBLIC

JOSHUA A. MARCUS  
NOTARY PUBLIC, State of New York  
No. 02MA6085921  
Qualified in Nassau County  
Commission Expires Jan. 13, 2014

# FAX TRANSMISSION

## FRANKLIN, GRINGER & COHEN, P.C.

666 Old Country Road, Suite 202  
Garden City, NY 11530-2013  
Telephone: (516) 228-3131  
Fax: (516) 228-3136

<b>To:</b>	Walker J. Harman, Esq. Peter J. Andrews, Esq. The Harman Firm, P.C.	<b>Date:</b>	October 22, 2012
<b>Fax #:</b>	(212) 202-3926	<b>Pages:</b>	<u>4</u> , including this cover sheet
<b>From:</b>	Joshua Marcus, Esq.		
<b>Subject:</b>	<i>Amado S. Pla, et al. v. Renaissance Equity Holdings, et al.</i> <i>Index No. 12 Civ. 5268 (JMF)</i>		

### COMMENTS:

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cover sheet

**From:** Joshua Marcus, Esq.

**Subject:** *Amado S. Pla, et al. v. Renaissance Equity Holdings, et al.*  
*Index No. 12 Civ. 5268 (JMF)*

**COMMENTS:**